


# **EXHIBIT D**

**From:** Gina Altomare <gina.altomare@sbcglobal.net> 

**Subject:** M.H. v. County of Alameda - Notice of Inspection

**Date:** August 16, 2013 10:45:27 AM PDT

**To:** Valerie Ly <vly@andradalaw.com>, Randy Andrada <randrada@andradalaw.com>, Matt Grigg <mmg@hudginslaw.com>, Nancy Hudgins <neh@hudginslaw.com>, Ben Nisenbaum <bnisenbaum@gmail.com>, John Burris <Burris@lmi.net>

**Cc:** "haddad.sherwin@sbcglobal.net Haddad & Sherwin" <haddad.sherwin@sbcglobal.net>, Genevieve Guertin <genevieve.guertin@sbcglobal.net>



1 Attachment, 248 KB

Dear Counsel:

Attached please find Plaintiffs' notice of inspection for Martin Harrison's original medical records by forensic documents examiner Patricia Fisher at 8:00 a.m. on August 28, 2013 at the following address:

1990 North California Boulevard, 8th Floor  
Walnut Creek, CA 94596  
(510) 987-8129

A hard copy will follow by mail.

Thank you,

Gina

Gina Altomare  
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RFP5.Notice...pdf (248 KB)

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 Guardian Ad Litem, Michelle Henshaw

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Attorneys for Plaintiffs Joseph Harrison, Krystle  
 Harrison, Martin Harrison, Jr., and Tiffany Harrison

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

M.H., a minor, through his Guardian Ad Litem,  
 Michelle Henshaw, JOSEPH HARRISON, KRYSTLE  
 HARRISON, MARTIN HARRISON, JR., and  
 TIFFANY HARRISON, all Individually and as Co-  
 Successors in Interest of Decedent MARTIN  
 HARRISON,

Plaintiffs,

vs.

COUNTY OF ALAMEDA, a municipal corporation;  
 SHERIFF GREGORY J. AHERN, in his individual and  
 official capacities; DEPUTIES MATTHEW AHLF,  
 ALEJANDRO VALVERDE, JOSHUA SWETNAM,  
 ROBERTO MARTINEZ, ZACHARY LITVINCHUK,  
 RYAN MADIGAN, MICHAEL BARENO,  
 FERNANDO ROJAS-CASTANEDA, SHAWN  
 SOBRERO, SOLOMON UNUBUN; MEGAN HAST,  
 A.S.W.; CORIZON HEALTH, INC., a Delaware  
 corporation; HAROLD ORR, M.D.; ZELDA  
 SANCHO, L.V.N.; and DOES 5-20, individually,  
 jointly and severally,

Defendants.

Case No. C11-2868 JST (MEJ)

**PLAINTIFFS' REQUEST FOR  
 PRODUCTION OF DOCUMENTS  
 AND THINGS TO ALL  
 DEFENDANTS (NOTICE OF  
 INSPECTION) (SET FIVE)**

PROPOUNDING PARTY: PLAINTIFFS JOSEPH HARRISON, KRYSTLE HARRISON, MARTIN HARRISON JR., and TIFFANY HARRISON

RESPONDING PARTY: ALL DEFENDANTS

SET NO.: FIVE

Plaintiffs demand pursuant to Federal Rule of Civil Procedure 34 that, **at 8:00 a.m. on August 28, 2013**, Defendants produce for inspection by forensic documents examiner Patricia Fisher all of the following items or categories of items in their possession, custody, or control, at **1990 North California Boulevard, 8<sup>th</sup> Floor, Walnut Creek, CA 94596, (510) 987-8129**. The inspection shall continue from day to day until completed. Further, Plaintiffs request that Defendants serve a written response as to each item or category of item pursuant to Federal Rule of Civil Procedure 34(b).

Privilege: If any document is withheld under a claim of privilege, provide a privilege log, including but not limited to a list identifying each document, the date, the author or person responsible for creating the document, the recipient of the document, the subject matter of the document, the privilege claimed, the number of pages of any document and length of any recording.

Missing documents: If any document is not currently in your possession, custody, or control, state whether it is missing or lost; has been destroyed, and if so, in what manner; has been involuntarily or voluntarily transferred to others, and if so, to whom; had otherwise been disposed of, and if so, how. Describe in detail the nature of, circumstances surrounding, and date of disposition of the document.

### DEFINITIONS

**"DOCUMENTS"** or **"DOCUMENTATION"** (whether written in upper or lower case) means handwriting, typewriting, printing, photostating, photocopying, recording, and every other means of recording upon any tangible thing, any form or communication or representation, including letters, words, pictures, sounds or symbols, or combinations thereof, as defined by California Evidence Code Section 250, and includes, but is not limited to audio and video recordings, letters, drafts, notebooks, diaries, calendars, notes, correspondence of any kind, records, reports of any kind, quality control reports, investigation reports, inspection reports, insurance



1 policies, insurance claims forms, forms of any kind, statements, invoices, bills, bills of lading, bills  
 2 of sale, permits, licenses, memoranda, minutes of meetings of any kind, telephone messages,  
 3 directives, court orders, court documents of any kind, maintenance records, maintenance reports,  
 4 inspection forms, inspection reports, inspection data, research data, studies, analyses, reports of  
 5 analyses, experiments, cost surveys, tests, test data, checklists, data sheets, specifications, sales  
 6 brochures, owners' manuals, operations' manuals, maintenance manuals, instruction manuals,  
 7 procedures' manuals, manuals of any kind, itemizations, agendas, compliance orders, notices to  
 8 abate, contracts, agreements, bids, computer printouts, e-mails, computer files, notebooks, diaries,  
 9 tallies, receipts, photographs, videos, transcripts, statements, minutes, and information/data  
 10 summaries, and any and all electronic data, including but not limited to emails, logs, notes, reports,  
 11 drafts, and Computer Assisted Dispatch (CAD) information.

## 12 REQUEST

13 1. Please produce all original DOCUMENTS reflecting medical records of Martin C.  
 14 Harrison, deceased, including but not limited to all records from Glenn Dyer Detention Facility,  
 15 Santa Rita Jail, and all documents generated and/or maintained by Defendant Corizon Health, Inc.  
 16 and the County of Alameda for forensic inspection, copying, testing and/or sampling by forensic  
 17 documents examiner Patricia Fisher, pursuant to Federal Rule of Civil Procedure 34.

18 Please produce these DOCUMENTS on **August 28, 2013, at 8:00 a.m.** at the  
 19 following address:

20 **1990 North California Boulevard, 8<sup>th</sup> Floor**  
 21 **Walnut Creek, CA 94596**  
 22 **(510) 987-8129**

23 Dated: August 16, 2013

HADDAD & SHERWIN

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26 GINA ALTOMARE  
 27 Attorneys for Plaintiffs  
 28 JOSEPH HARRISON, KRYSTLE HARRISON,  
 MARTIN HARRISON JR., and TIFFANY  
 HARRISON

***PROOF OF SERVICE***

(FRCivP 5 AND 28 USC § 1746)

Re: *M.H. v. County of Alameda, et al.*, No. C11-2868 JST (MEJ)

I declare that: I am employed in the County of Alameda, State of California. I am over the age of eighteen years and not a party to the within entitled cause; my business address is 505 Seventeenth Street, Oakland, California 94612.

On August 16, 2013, I served the attached PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS (NOTICE OF INSPECTION) (SET FIVE) on the parties in said cause, by placing a true copy thereof in a sealed envelope with postage thereon fully prepaid, VIA U.S. MAIL, in Oakland, California, and by causing copies of such documents to be transmitted BY ELECTRONIC MAIL in portable document format ("PDF") from the electronic mail address [gina.altomare@sbcglobal.net](mailto:gina.altomare@sbcglobal.net), addressed as follows:

J. Randall Andrada  
Valerie Ly  
ANDRADA & ASSOCIATES  
180 Grand Avenue, Suite 225  
Oakland, CA 94612  
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I declare under penalty of perjury that the foregoing is true and correct and on the date stated above, this declaration was executed at Oakland, California.

  
\_\_\_\_\_  
GINA ALTOMARE